

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

ALLSTATE INSURANCE COMPANY, ALLSTATE
INDEMNITY COMPANY, ALLSTATE FIRE & CASUALTY
INSURANCE COMPANY, AND ALLSTATE PROPERTY &
CASUALTY INSURANCE COMPANY,

Plaintiffs,

-against-

MARK H. VINE, MD, SERGEY ALEKSEYEVICH
KALITENKO, MD, SOORAJNITIN POONAWALA, DO, ERIC
W. KENWORTHY, MD, ELENA BORISOVNA STYBEL, DO,
GRACE MEDICAL HEALTH PROVIDER P.C., HEADLAM
MEDICAL PROFESSIONAL CORPORATION, SERGEY A.
KALITENKO, PHYSICIAN, P.C., YANA MIRONOVICH, NEW
YORK BILLING AND PROCESSING CORP., JOHN DOES 1-6,
AND ABC CORPS. 1-6,

Defendants.

Civil Action No.:
1:23-cv-08070-RPK-LB

ANSWER TO COMPLAINT

Now comes the Defendant, MARK H. VINE , MD, (“Answering Defendant”) and
interpose the following pleading as and for his Answer to Plaintiffs’ Complaint in this matter.

1. The Answering Defendant denies information sufficient to form a belief as to
the allegations contained in paragraph 1 of the Complaint.

2. The Answering Defendant denies the allegations contained in paragraph 2 of
the Plaintiffs’ Complaint insofar as they relate or refer to the Answering Defendant. The
Answering Defendant denies information sufficient to form a belief as to the balance of the
allegations contained in this paragraph.

3. The Answering Defendant denies the allegations contained in paragraph 3 of
the Plaintiffs’ Complaint insofar as they relate or refer to the Answering Defendant. The
Answering Defendant denies information sufficient to form a belief as to the balance of the
allegations contained in this paragraph.

4. The Answering Defendant denies the allegations contained in paragraph 4 of
the Plaintiffs’ Complaint insofar as they relate or refer to the Answering Defendant. The
Answering Defendant denies information sufficient to form a belief as to the balance of the
allegations contained in this paragraph.

5. The Answering Defendant denies the allegations contained in paragraph 5 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

6. The Answering Defendant denies the allegations contained in paragraph 6 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

7. The Answering Defendant denies the allegations contained in paragraph 7 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

8. The Answering Defendant denies the allegations contained in paragraph 8 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

9. The Answering Defendant denies the allegations contained in paragraph 9 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

10. The Answering Defendant denies the allegations contained in paragraph 10 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

11. The Answering Defendant denies the allegations contained in paragraph 11 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

12. The Answering Defendant denies the allegations contained in paragraph 12 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

13. The Answering Defendant denies the allegations contained in paragraph 13 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

14. The Answering Defendant denies the allegations contained in paragraph 14 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The

Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

15. The Answering Defendant denies the allegations contained in paragraph 15 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

16. The Answering Defendant denies the allegations contained in paragraph 16 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

17. The Answering Defendant denies the allegations contained in paragraph 17 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

18. The Answering Defendant denies the allegations contained in paragraph 18 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

19. The Answering Defendant denies the allegations contained in paragraph 19 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

20. The Answering Defendant denies the allegations contained in paragraph 20 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

21. The Answering Defendant denies the allegations contained in paragraph 21 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

22. The Answering Defendant denies the allegations contained in paragraph 22 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

23. The Answering Defendant denies the allegations contained in paragraph 23 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

24. The Answering Defendant denies the allegations contained in paragraph 24 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

25. The Answering Defendant denies the allegations contained in paragraph 25 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

26. The Answering Defendant denies the allegations contained in paragraph 26 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

27. The Answering Defendant denies the allegations contained in paragraph 27 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

28. The Answering Defendant denies the allegations contained in paragraph 28 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

29. The Answering Defendant denies the allegations contained in paragraph 29 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

30. The Answering Defendant denies the allegations contained in paragraph 30 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

31. The Answering Defendant denies the allegations contained in paragraph 31 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

32. The Answering Defendant denies the allegations contained in paragraph 32 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

33. The Answering Defendant denies the allegations contained in paragraph 33 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The

Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

34. The Answering Defendant denies information sufficient to form a belief as to the allegations contained in paragraph 34 of the Complaint.

35. The Answering Defendant denies information sufficient to form a belief as to the allegations contained in paragraph 35 of the Complaint.

36. The Answering Defendant denies information sufficient to form a belief as to the allegations contained in paragraph 36 of the Complaint.

37. The Answering Defendant denies information sufficient to form a belief as to the allegations contained in paragraph 37 of the Complaint.

38. The Answering Defendant denies information sufficient to form a belief as to the allegations contained in paragraph 38 of the Complaint.

39. The Answering Defendant denies information sufficient to form a belief as to the allegations contained in paragraph 39 of the Complaint.

40. The Answering Defendant denies information sufficient to form a belief as to the allegations contained in paragraph 40 of the Complaint.

41. The Answering Defendant denies information sufficient to form a belief as to the allegations contained in paragraph 41 of the Complaint except admits he is a resident of the State of New York and is licensed by the State of New York to practice the profession of medicine. .

42. The Answering Defendant denies information sufficient to form a belief as to the allegations contained in paragraph 42 of the Complaint.

43. The Answering Defendant denies information sufficient to form a belief as to the allegations contained in paragraph 43 of the Complaint.

44. The Answering Defendant denies information sufficient to form a belief as to the allegations contained in paragraph 44 of the Complaint.

45. The Answering Defendant denies information sufficient to form a belief as to the allegations contained in paragraph 45 of the Complaint.

46. The Answering Defendant denies information sufficient to form a belief as to the allegations contained in paragraph 46 of the Complaint.

47. The Answering Defendant denies information sufficient to form a belief as to the allegations contained in paragraph 47 of the Complaint.

48. The Answering Defendant denies information sufficient to form a belief as to

the allegations contained in paragraph 48 of the Complaint.

49. The Answering Defendant denies information sufficient to form a belief as to the allegations contained in paragraph 49 of the Complaint.

50. The Answering Defendant denies the allegations contained in paragraph 50 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

51. The Answering Defendant denies the allegations contained in paragraph 51 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

52. The Answering Defendant denies the allegations contained in paragraph 52 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

53. The Answering Defendant denies the allegations contained in paragraph 53 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

54. The Answering Defendant denies the allegations contained in paragraph 54 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

55. Denies the allegations contained in paragraph 55 of the Complaint as legal conclusions to which no responsive pleading is required.

56. Denies the allegations contained in paragraph 56 of the Complaint as legal conclusions to which no responsive pleading is required.

57. Denies the allegations contained in paragraph 57 of the Complaint as legal conclusions to which no responsive pleading is required.

58. Denies the allegations contained in paragraph 58 of the Complaint as legal conclusions to which no responsive pleading is required.

59. Denies the allegations contained in paragraph 59 of the Complaint as legal conclusions to which no responsive pleading is required.

60. The Answering Defendant denies the allegations contained in paragraph 60 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The

Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

61. The Answering Defendant denies the allegations contained in paragraph 61 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

62. Denies the allegations contained in paragraph 62 of the Complaint as legal conclusions to which no responsive pleading is required.

63. The Answering Defendant neither admits nor denies the allegations contained in paragraph 63 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule. The Answering Defendant neither admits nor denies the allegations contained in paragraph 63 of the Plaintiffs' Complaint as the allegations purport to interpret New Jersey State Law, the New Jersey State No-fault insurance laws and regulations and/or the Worker's Compensation Fee Schedule.

64. The Answering Defendant denies the allegations contained in paragraph 64 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

65. The Answering Defendant denies the allegations contained in paragraph 65 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

66. The Answering Defendant denies the allegations contained in paragraph 66 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

67. The Answering Defendant denies the allegations contained in paragraph 67 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

68. The Answering Defendant denies the allegations contained in paragraph 68 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

69. The Answering Defendant denies the allegations contained in paragraph 69 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the

allegations contained in this paragraph.

70. The Answering Defendant denies the allegations contained in paragraph 70 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

71. The Answering Defendant denies the allegations contained in paragraph 71 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

72. The Answering Defendant neither admits nor denies the allegations contained in paragraph 72 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

73. The Answering Defendant denies the allegations contained in paragraph 73 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

74. The Answering Defendant neither admits nor denies the allegations contained in paragraph 74 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule. The Answering Defendant neither admits nor denies the allegations contained in paragraph 74 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

75. The Answering Defendant neither admits nor denies the allegations contained in paragraph 75 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

76. The Answering Defendant denies the allegations contained in paragraph 76 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

77. The Answering Defendant denies the allegations contained in paragraph 77 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

78. The Answering Defendant denies the allegations contained in paragraph 78 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

79. The Answering Defendant denies the allegations contained in paragraph 79 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

80. The Answering Defendant denies the allegations contained in paragraph 80 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

81. The Answering Defendant denies the allegations contained in paragraph 81 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

82. The Answering Defendant denies the allegations contained in paragraph 82 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant except admits that Vine became licensed to practice medicine in New York in 1976. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

83. The Answering Defendant denies the allegations contained in paragraph 83 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

84. The Answering Defendant denies the allegations contained in paragraph 84 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

85. The Answering Defendant denies the allegations contained in paragraph 85 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

86. The Answering Defendant denies the allegations contained in paragraph 86 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

87. The Answering Defendant denies the allegations contained in paragraph 87 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

88. The Answering Defendant denies the allegations contained in paragraph 88 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the

allegations contained in this paragraph.

89. The Answering Defendant denies the allegations contained in paragraph 89 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

90. The Answering Defendant denies the allegations contained in paragraph 90 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

91. The Answering Defendant denies the allegations contained in paragraph 91 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

92. The Answering Defendant denies the allegations contained in paragraph 92 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

93. The Answering Defendant denies the allegations contained in paragraph 93 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

94. The Answering Defendant denies the allegations contained in paragraph 94 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

95. The Answering Defendant neither admits nor denies the allegations contained in paragraph 95 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

96. The Answering Defendant denies the allegations contained in paragraph 96 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

97. The Answering Defendant denies the allegations contained in paragraph 97 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

98. The Answering Defendant denies the allegations contained in paragraph 98 of

the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

99. The Answering Defendant denies the allegations contained in paragraph 99 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

100. The Answering Defendant neither admits nor denies the allegations contained in paragraph 100 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

101. The Answering Defendant denies the allegations contained in paragraph 101 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

102. The Answering Defendant denies the allegations contained in paragraph 102 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

103. The Answering Defendant denies the allegations contained in paragraph 103 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

104. The Answering Defendant denies the allegations contained in paragraph 104 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

105. The Answering Defendant denies the allegations contained in paragraph 105 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

106. The Answering Defendant denies the allegations contained in paragraph 106 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

107. The Answering Defendant denies the allegations contained in paragraph 107 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

108. The Answering Defendant denies the allegations contained in paragraph 108 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

109. The Answering Defendant denies the allegations contained in paragraph 109 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

110. The Answering Defendant denies the allegations contained in paragraph 110 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

111. The Answering Defendant denies the allegations contained in paragraph 111 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

112. The Answering Defendant denies the allegations contained in paragraph 112 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

113. The Answering Defendant denies the allegations contained in paragraph 113 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

114. The Answering Defendant denies the allegations contained in paragraph 114 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

115. The Answering Defendant denies the allegations contained in paragraph 115 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

116. The Answering Defendant denies the allegations contained in paragraph 116 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

117. The Answering Defendant denies the allegations contained in paragraph 117 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The

Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

118. The Answering Defendant denies the allegations contained in paragraph 118 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

119. The Answering Defendant denies the allegations contained in paragraph 119 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

120. The Answering Defendant denies the allegations contained in paragraph 120 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

121. The Answering Defendant denies the allegations contained in paragraph 121 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

122. The Answering Defendant denies the allegations contained in paragraph 122 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

123. The Answering Defendant denies the allegations contained in paragraph 123 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

124. The Answering Defendant denies the allegations contained in paragraph 124 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

125. The Answering Defendant denies the allegations contained in paragraph 125 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

126. The Answering Defendant denies the allegations contained in paragraph 126 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

127. The Answering Defendant denies the allegations contained in paragraph 127 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

128. The Answering Defendant denies the allegations contained in paragraph 128 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

129. The Answering Defendant denies the allegations contained in paragraph 129 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

130. The Answering Defendant denies the allegations contained in paragraph 130 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

131. The Answering Defendant denies the allegations contained in paragraph 131 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

132. The Answering Defendant denies the allegations contained in paragraph 132 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

133. The Answering Defendant denies the allegations contained in paragraph 133 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

134. The Answering Defendant neither admits nor denies the allegations contained in paragraph 134 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

135. The Answering Defendant denies the allegations contained in paragraph 135 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

136. The Answering Defendant denies the allegations contained in paragraph 136 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the

allegations contained in this paragraph. The Answering Defendant denies the allegations contained in paragraph 1 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph. The Answering Defendant denies the allegations contained in paragraph 1 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

137. The Answering Defendant denies the allegations contained in paragraph 137 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

138. The Answering Defendant denies the allegations contained in paragraph 138 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

139. The Answering Defendant denies the allegations contained in paragraph 139 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

140. The Answering Defendant denies the allegations contained in paragraph 140 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

141. The Answering Defendant denies the allegations contained in paragraph 141 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

142. The Answering Defendant denies the allegations contained in paragraph 142 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

143. The Answering Defendant denies the allegations contained in paragraph 143 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

144. The Answering Defendant denies the allegations contained in paragraph 144 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the

allegations contained in this paragraph.

145. The Answering Defendant denies the allegations contained in paragraph 145 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

146. The Answering Defendant denies the allegations contained in paragraph 146 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

147. The Answering Defendant denies the allegations contained in paragraph 147 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

148. The Answering Defendant denies the allegations contained in paragraph 148 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

149. The Answering Defendant denies the allegations contained in paragraph 149 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

150. The Answering Defendant denies the allegations contained in paragraph 150 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

151. The Answering Defendant denies the allegations contained in paragraph 151 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

152. The Answering Defendant neither admits nor denies the allegations contained in paragraph 152 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

153. The Answering Defendant denies the allegations contained in paragraph 153 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

154. The Answering Defendant denies the allegations contained in paragraph 154

of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

155. The Answering Defendant denies the allegations contained in paragraph 155 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

156. The Answering Defendant denies the allegations contained in paragraph 156 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

157. The Answering Defendant denies the allegations contained in paragraph 157 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

158. The Answering Defendant denies the allegations contained in paragraph 158 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

159. The Answering Defendant denies the allegations contained in paragraph 159 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

160. The Answering Defendant denies the allegations contained in paragraph 160 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

161. The Answering Defendant denies the allegations contained in paragraph 161 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

162. The Answering Defendant denies the allegations contained in paragraph 162 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

163. The Answering Defendant denies the allegations contained in paragraph 163 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the

allegations contained in this paragraph.

164. The Answering Defendant denies the allegations contained in paragraph 164 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

165. The Answering Defendant denies the allegations contained in paragraph 165 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

166. The Answering Defendant denies the allegations contained in paragraph 166 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

167. The Answering Defendant denies the allegations contained in paragraph 167 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

168. The Answering Defendant denies the allegations contained in paragraph 168 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

169. The Answering Defendant denies the allegations contained in paragraph 169 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

170. The Answering Defendant denies the allegations contained in paragraph 170 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

171. The Answering Defendant denies the allegations contained in paragraph 171 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

172. The Answering Defendant denies the allegations contained in paragraph 172 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

173. The Answering Defendant denies the allegations contained in paragraph 173 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

174. The Answering Defendant denies the allegations contained in paragraph 174 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

175. The Answering Defendant denies the allegations contained in paragraph 175 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

176. The Answering Defendant denies the allegations contained in paragraph 176 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

177. The Answering Defendant denies the allegations contained in paragraph 177 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

178. The Answering Defendant denies the allegations contained in paragraph 178 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

179. The Answering Defendant denies the allegations contained in paragraph 179 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

180. The Answering Defendant denies the allegations contained in paragraph 180 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

181. The Answering Defendant denies the allegations contained in paragraph 181 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

182. The Answering Defendant denies the allegations contained in paragraph 182 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The

Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

183. The Answering Defendant denies the allegations contained in paragraph 183 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

184. The Answering Defendant denies the allegations contained in paragraph 184 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

185. The Answering Defendant denies the allegations contained in paragraph 185 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

186. The Answering Defendant denies the allegations contained in paragraph 186 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

187. The Answering Defendant denies the allegations contained in paragraph 187 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

188. The Answering Defendant denies the allegations contained in paragraph 188 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

189. The Answering Defendant denies the allegations contained in paragraph 189 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

190. The Answering Defendant denies the allegations contained in paragraph 190 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

191. The Answering Defendant denies the allegations contained in paragraph 191 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

192. The Answering Defendant denies the allegations contained in paragraph 192 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

193. The Answering Defendant denies the allegations contained in paragraph 193 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

194. The Answering Defendant denies the allegations contained in paragraph 194 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

195. The Answering Defendant denies the allegations contained in paragraph 195 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

196. The Answering Defendant denies the allegations contained in paragraph 196 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

197. The Answering Defendant denies the allegations contained in paragraph 197 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

198. The Answering Defendant denies the allegations contained in paragraph 198 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

199. The Answering Defendant denies the allegations contained in paragraph 199 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

200. The Answering Defendant denies the allegations contained in paragraph 200 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

201. The Answering Defendant denies the allegations contained in paragraph 201 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The

Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

202. The Answering Defendant denies the allegations contained in paragraph 202 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

203. The Answering Defendant denies the allegations contained in paragraph 203 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

204. The Answering Defendant denies the allegations contained in paragraph 204 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

205. The Answering Defendant denies the allegations contained in paragraph 205 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

206. The Answering Defendant denies the allegations contained in paragraph 206 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

207. The Answering Defendant denies the allegations contained in paragraph 207 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

208. The Answering Defendant denies the allegations contained in paragraph 208 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

209. The Answering Defendant denies the allegations contained in paragraph 209 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

210. The Answering Defendant denies the allegations contained in paragraph 210 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

211. The Answering Defendant denies the allegations contained in paragraph 211 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

212. The Answering Defendant denies the allegations contained in paragraph 212 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

213. The Answering Defendant denies the allegations contained in paragraph 213 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

214. The Answering Defendant denies the allegations contained in paragraph 214 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

215. The Answering Defendant denies the allegations contained in paragraph 215 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

216. The Answering Defendant denies the allegations contained in paragraph 216 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

217. The Answering Defendant denies the allegations contained in paragraph 217 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

218. The Answering Defendant denies the allegations contained in paragraph 218 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

219. The Answering Defendant denies the allegations contained in paragraph 219 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

220. The Answering Defendant denies the allegations contained in paragraph 220 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The

Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

221. The Answering Defendant denies the allegations contained in paragraph 221 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

222. The Answering Defendant denies the allegations contained in paragraph 222 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

223. The Answering Defendant denies the allegations contained in paragraph 223 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

224. The Answering Defendant denies the allegations contained in paragraph 224 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

225. The Answering Defendant denies the allegations contained in paragraph 225 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

226. The Answering Defendant denies the allegations contained in paragraph 226 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

227. The Answering Defendant neither admits nor denies the allegations contained in paragraph 227 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

228. The Answering Defendant neither admits nor denies the allegations contained in paragraph 228 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

229. The Answering Defendant neither admits nor denies the allegations contained in paragraph 229 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

230. The Answering Defendant neither admits nor denies the allegations contained in paragraph 230 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

231. The Answering Defendant denies the allegations contained in paragraph 231 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

232. The Answering Defendant denies the allegations contained in paragraph 232 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

233. The Answering Defendant neither admits nor denies the allegations contained in paragraph 233 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

234. The Answering Defendant neither admits nor denies the allegations contained in paragraph 234 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

235. The Answering Defendant neither admits nor denies the allegations contained in paragraph 235 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

236. The Answering Defendant denies the allegations contained in paragraph 236 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

237. The Answering Defendant denies the allegations contained in paragraph 237 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

238. The Answering Defendant denies the allegations contained in paragraph 238 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

239. The Answering Defendant neither admits nor denies the allegations contained in paragraph 239 of the Plaintiffs' Complaint as the allegations purport to interpret New

York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

240. The Answering Defendant denies the allegations contained in paragraph 240 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

241. The Answering Defendant incorporate, as though fully set forth herein, each and every answer set forth in the foregoing paragraphs.

242. The Answering Defendant denies the allegations contained in paragraph 242 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

243. The Answering Defendant denies the allegations contained in paragraph 243 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

244. The Answering Defendant denies the allegations contained in paragraph 244 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

245. The Answering Defendant denies the allegations contained in paragraph 245 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

246. The Answering Defendant denies the allegations contained in paragraph 246 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

247. The Answering Defendant denies the allegations contained in paragraph 247 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

248. The Answering Defendant denies the allegations contained in paragraph 248 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

249. The Answering Defendant denies the allegations contained in paragraph 249

of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

250. The Answering Defendant denies the allegations contained in paragraph 250 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

251. The Answering Defendant denies the allegations contained in paragraph 251 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

252. The Answering Defendant denies the allegations contained in paragraph 252 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

253. The Answering Defendant denies the allegations contained in paragraph 253 of the Complaint.

254. The Answering Defendant incorporate, as though fully set forth herein, each and every answer set forth in the foregoing paragraphs.

255. The Answering Defendant denies the allegations contained in paragraph 255 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

256. The Answering Defendant denies the allegations contained in paragraph 256 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

257. The Answering Defendant denies the allegations contained in paragraph 257 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

258. The Answering Defendant incorporate, as though fully set forth herein, each and every answer set forth in the foregoing paragraphs.

259. The Answering Defendant denies the allegations contained in paragraph 259 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

260. The Answering Defendant denies the allegations contained in paragraph 260 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

261. The Answering Defendant denies the allegations contained in paragraph 261 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

262. The Answering Defendant denies the allegations contained in paragraph 262 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

263. The Answering Defendant denies the allegations contained in paragraph 263 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

264. The Answering Defendant denies the allegations contained in paragraph 264 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

265. The Answering Defendant denies the allegations contained in paragraph 265 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

266. The Answering Defendant denies the allegations contained in paragraph 266 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

267. The Answering Defendant denies the allegations contained in paragraph 267 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

268. The Answering Defendant incorporate, as though fully set forth herein, each and every answer set forth in the foregoing paragraphs.

269. The Answering Defendant denies the allegations contained in paragraph 269 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

270. The Answering Defendant denies the allegations contained in paragraph 270 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

271. The Answering Defendant denies the allegations contained in paragraph 271 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

272. The Answering Defendant denies the allegations contained in paragraph 272 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

273. The Answering Defendant denies the allegations contained in paragraph 273 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

274. The Answering Defendant denies the allegations contained in paragraph 274 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

275. The Answering Defendant incorporate, as though fully set forth herein, each and every answer set forth in the foregoing paragraphs.

276. The Answering Defendant denies the allegations contained in paragraph 276 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

277. The Answering Defendant denies the allegations contained in paragraph 277 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

278. The Answering Defendant denies the allegations contained in paragraph 278 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

279. The Answering Defendant denies the allegations contained in paragraph 279 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

280. The Answering Defendant denies the allegations contained in paragraph 280 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

281. The Answering Defendant denies the allegations contained in paragraph 281 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

282. The Answering Defendant denies the allegations contained in paragraph 282 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

283. The Answering Defendant denies the allegations contained in paragraph 283 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

284. The Answering Defendant incorporate, as though fully set forth herein, each and every answer set forth in the foregoing paragraphs.

285. The Answering Defendant denies the allegations contained in paragraph 285 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

286. The Answering Defendant denies the allegations contained in paragraph 286 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

287. The Answering Defendant denies the allegations contained in paragraph 287 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

288. The Answering Defendant denies the allegations contained in paragraph 288 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

289. The Answering Defendant denies the allegations contained in paragraph 289 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

290. The Answering Defendant denies the allegations contained in paragraph 290 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

291. The Answering Defendant denies the allegations contained in paragraph 291 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

292. The Answering Defendant denies the allegations contained in paragraph 292 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

293. The Answering Defendant denies the allegations contained in paragraph 293 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

294. The Answering Defendant denies the allegations contained in paragraph 294 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

295. The Answering Defendant denies the allegations contained in paragraph 295 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

296. The Answering Defendant denies the allegations contained in paragraph 296 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

297. The Answering Defendant denies the allegations contained in paragraph 297 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

298. The Answering Defendant denies the allegations contained in paragraph 298 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

299. The Answering Defendant incorporate, as though fully set forth herein, each and every answer set forth in the foregoing paragraphs.

300. The Answering Defendant denies the allegations contained in paragraph 300 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

301. The Answering Defendant denies the allegations contained in paragraph 301 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

302. The Answering Defendant denies the allegations contained in paragraph 302 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendant. The Answering Defendant denies information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

JURY DEMAND

The Answering Defendant neither admits nor denies the statement as it is a jury demand.

FIRST AFFIRMATIVE DEFENSE

The Plaintiffs' Complaint fails to state a claim upon which relief may be granted.

SECOND AFFIRMATIVE DEFENSE

The Plaintiffs' Complaint is barred by the Statute of Frauds.

THIRD AFFIRMATIVE DEFENSE

The Plaintiffs' Complaint is barred by the Statute of Limitations.

FOURTH AFFIRMATIVE DEFENSE

The Plaintiffs' Complaint is barred by the Statute of Repose.

FIFTH AFFIRMATIVE DEFENSE

The Plaintiffs' Complaint is barred by the doctrine of laches.

SIXTH AFFIRMATIVE DEFENSE

The Plaintiffs' Complaint is barred by the doctrine of unclean hands.

SEVENTH AFFIRMATIVE DEFENSE

The Plaintiffs' Complaint is barred by the doctrine of equitable estoppel.

EIGHTH AFFIRMATIVE DEFENSE

The Plaintiffs are barred by the doctrine of res judicata.

NINTH AFFIRMATIVE DEFENSE

The Plaintiffs are barred by the doctrine of collateral estoppel.

TENTH AFFIRMATIVE DEFENSE

The Plaintiffs are barred by the doctrine of claim preclusion.

ELEVENTH AFFIRMATIVE DEFENSE

The Plaintiffs are barred by the doctrine of issue preclusion.

TWELFTH AFFIRMATIVE DEFENSE

The Plaintiffs are barred from recovery for lack of privity.

THIRTEENTH AFFIRMATIVE DEFENSE

The Plaintiffs are barred from recovery as they have failed to satisfy a necessary jurisdictional prerequisite.

FOURTEENTH AFFIRMATIVE DEFENSE

The Plaintiffs are barred from recovery by the doctrine of waiver.

FIFTEENTH AFFIRMATIVE DEFENSE

The Plaintiffs are barred from recovery by the doctrine of offer and compromise.

SIXTEENTH AFFIRMATIVE DEFENSE

The Plaintiffs are barred from recovery as they have failed to comply with the rules and regulations of the State of New York pertaining to no-fault insurance coverage.

SEVENTEENTH AFFIRMATIVE DEFENSE

The Plaintiffs are barred from recovery as any damages suffered have been recouped through subrogation.

EIGHTEENTH AFFIRMATIVE DEFENSE

The Plaintiffs are barred from recovery as any damages suffered have been passed through to insureds through the adjustment of insurance rates as reported to the New York Insurance Department.

NINETEENTH AFFIRMATIVE DEFENSE

The Plaintiffs cannot seek a Declaratory Judgment against the professional corporation as there is existing arbitration and litigation. The professional corporation's right to choose forum under the NY No-fault Rules and Regulation cannot be abrogated by the Plaintiff instituting this action.

TWENTIETH AFFIRMATIVE DEFENSE

Plaintiffs have not satisfied their burden to reverse, modify or amend arbitration rulings as required under the New York Alternative Procedure for Dispute Resolution Act, or the New York Arbitration Act

TWENTY-FIRST AFFIRMATIVE DEFENSE

The Plaintiffs cannot seek a Declaratory Judgment against the professional corporation as there is existing arbitration and litigation. The professional corporation's right to choose forum under the NY No-fault Rules and Regulation cannot be abrogated by the Plaintiff instituting this action.

TWENTY SECOND AFFIRMATIVE DEFENSE

The Plaintiffs are barred from recovering any sums which were paid as a result of Judgments or Arbitration Awards.

DEFENDANTS DEMAND A TRIAL BY JURY

Dated: January 15, 2024
Garden City, New York

SCHWARTZ, CONROY & HACK, PC
Counsel for Defendants
Mark H. Vine, M.D.

Matthew J. Conroy
Matthew J. Conroy, Esq.
666 Old Country Road, 9th Floor
Garden City, New York 11530
(516) 745-1122
(516) 745-0844 fax
mjc@schlawpc.com

TO:

Short & Billy, P.C.
Attorneys for Plaintiffs
Andrew S. Midgett, Esq.

Skip Short, Esq.
217 Broadway Suite 300
New York, New York 10007
(212) 732-3320

Bruno, Gerbino, Soriano & Aitken, LLP
Attorneys for Plaintiffs
Vincent Gerbino, Esq.
445 Broad Hollow Road, Suite 420
Melville, New York 11747
(631) 390-0010